



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

Representing California's Historic Fishery

April 10, 2005

Mr. Phil Isenberg, Chair
MLPA Blue Ribbon Task Force
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Attn: Melissa Miller-Henson

Subject: Comments on Final Draft Master Plan Framework

Dear Mr. Isenberg and Task Force Members:

I and members of California's wetfish industry very much appreciate this additional opportunity to present our views on the final draft Master Plan Framework. I also thank the Recreational Fishing Alliance for delivering this message because I am unable to attend the meeting in person. RFA and CWPA are members of the California Fisheries Coalition, which is represented today by Vern Goehring. We support the comments that Vern will deliver today. In fact, all coalition members seek similar goals: beginning with our belief that the MLPA Initiative should be implemented in a manner consistent with the intent of the law.

It is clear that California's ocean policy intends to coordinate and integrate its numerous programs and activities to protect and conserve marine resources. The MLPA seeks to protect marine biodiversity and ecosystems; enhance threatened species and habitats; and ensure recreation, scientific and educational opportunities while supporting ocean dependent economic activities. The intent of the law is to improve a statewide system of marine protected areas, and it requires that existing MPAs be re-examined. We believe the logical place for the MLPAI process to begin is at the beginning, with a clear definition of goals and specific objectives for improving a statewide system of marine protected areas, and a re-examination of existing MPAs and existing closures implemented by other agencies, including but not necessarily limited to the Department of Fish and Game and the military.

The MLPA addresses all impacts to the ocean, yet we continue to find a biased emphasis on fisheries in this final draft framework. We appreciate the heroic efforts of the author(s) to incorporate the extensive comments submitted by CFC members and others. Yet I have a distinct sense that while our comments may have been heard, our recommendations are not yet heeded.

As we commented on the preliminary and revised drafts, we view the purpose of the master plan framework as a blueprint for an improved statewide MPA system, configured as a network to the extent possible. We understand that the principal funders of this MLPA Initiative have a special interest in the central coast, but nevertheless, the central coast study area should be considered as a part of, and not in isolation from, this statewide system.

To the greatest possible extent, stakeholders, including fishermen, should be involved in the decision-making process, from setting over-arching as well as regional goals and objectives, to analysis of existing MPAs (and we advocate for including existing fishery management regulations and other closures in this process), to the ultimate decisions on how to IMPROVE the STATEWIDE system.

In this final version of the master plan framework, however, we see a diminished role for fishermen accompanied by an increased effort to incorporate scientific advice as policy, before defining the problems, establishing goals and objectives, re-examining existing closures and engaging in a data gap analysis. We believe science theory regarding size, shape and number of replicates of MPAs should be provided in a matrix outside the framework, as a series of options that may be considered by regional teams, as well as by a standing advisory committee, when discussing how to address the over-arching and regional goals and objectives of this program.

It is telling that the author(s) omitted an important passage from the National Academy of Sciences report on MPAs: "A fundamental lesson learned from experience throughout the world is that attempts to implement MPAs in the absence of general community support invariably fail."

We continue to voice concern that the MLPA program, if implemented under this final draft Master Plan Framework, will fail to meet its goals because of its narrow focus and rush to implement new MPAs without following the intent of the law – to examine the existing protection program and improve it. We believe this framework needs to change its focus to serve properly as a blueprint. If it does not, we fear the ultimate result may be another fractured set of closed areas that gamble the future of central coast communities and fishermen against theoretical benefits that may cause biological as well as economic unintended, but unmeasured, consequences: in short, a repetition of the Channel Islands reserve process. We recommend that the Blue Ribbon Task Force not approve this final draft framework until it adequately addresses our concerns.

On behalf of California's wetfish industry, I again express our thanks for this opportunity to comment. We'll look forward to further communications with the Blue Ribbon Task Force as we seek to achieve the goals of the MLPA Initiative. We hope the MLPFI will strive to achieve its goals in a manner that also protects and supports this historic fishery and the central coast fishing community.

Best regards,

Diane Pleschner-Steele
Executive Director